

EXHIBIT D

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CHARLENE CARTER)
)
) CIVIL ACTION NO.
VS.) 3:17-CV-02278-X
)
SOUTHWEST AIRLINES CO., AND)
TRANSPORT WORKERS UNION OF)
AMERICA, LOCAL 556)

CONFIDENTIAL
TWU LOCAL 556 30(b)(6)
ORAL DEPOSITION OF
AUDREY STONE
NOVEMBER 30, 2020

ANSWERS AND DEPOSITION OF AUDREY STONE,
produced as a witness at the instance of the
Plaintiff, taken in the above-styled and -numbered
cause on NOVEMBER 30, 2020, at 9:00 a.m., before
CHARIS M. HENDRICK, a Certified Shorthand Reporter
in and for the State of Texas, witness located in
Orting, Washington, pursuant to the Federal Rules
of Civil Procedure, the current emergency order
regarding the COVID-19 State of Disaster, and the
provisions stated on the record or attached hereto.

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1 any communications about Ms. Carter.

2 Q. Okay. Did anyone from the executive board
3 ever have any communications with Thom McDaniel
4 about Ms. Carter?

5 A. Not that I'm aware of. Not that I'm aware
6 of. Yeah, not that I recall.

7 Q. Okay.

8 A. And I -- again, I don't recall any
9 communications with the executive board. I believe
10 there was one communication from the treasurer
11 informing some of us that she had requested to stop
12 her COPE deduction.

13 Q. Okay. Did anybody from the executive
14 board ever have any communications with Don Shipman
15 about Carter prior to her termination?

16 A. Not that I am aware of.

17 Q. Okay. Let's see. If I could direct you
18 to Document 26. And I guess this will be marked as
19 Exhibit 22.

20 THE REPORTER: Did you want to mark 17
21 as 22 when you talked about it earlier?

22 MR. GILLIAM: No.

23 THE REPORTER: Okay.

24 (Exhibit 22 marked.)

25 A. Okay.

1 Q. (By Mr. Gilliam) And do you recognize
2 this?

3 A. Yes.

4 Q. And what is it?

5 A. It's the email I just spoke about where
6 Ms. Carter was requesting of our treasurer to stop
7 her contributions to Committee on Political
8 Education.

9 Q. Okay. And going, I guess, down to the
10 first response from John Parrott on November 16th,
11 2013; do you see where I am?

12 A. Yes.

13 Q. Okay. And it says, she has been
14 supporting the thing she despises this entire time.

15 Did -- did the executive board know
16 what political causes she -- she despised?

17 A. The executive board -- I don't know of any
18 knowledge the executive board had regarding her
19 political causes.

20 Q. Okay. And Cuyler Thompson responds, this
21 just made my morning.

22 Did -- so Cuyler Thompson knew who she
23 was prior to this email, correct?

24 A. Yes.

25 Q. Okay. And how did Cuyler Thompson know

1 A. No, I wasn't.

2 Q. Okay. So that's not a euphemism of some
3 kind?

4 A. No. I had a queso dip I frequently made
5 and took up to the union office that people really
6 enjoyed eating.

7 Q. Okay. And Brett Nevarez says, yum to
8 queso dip. So typical batshit/dipshit cannot read
9 her paycheck.

10 And did you know who batshit/dipshit
11 was?

12 A. I -- no. I -- I assumed that he was
13 speaking to -- speaking about Ms. Carter because I
14 believe she had already opted out of the union
15 itself at this point and didn't realize she was
16 still contributing to COPE.

17 Q. And had -- have you heard Brett Nevarez
18 refer to her at any other time as batshit/dipshit?

19 A. Batshit/dipshit, no.

20 Q. Okay. Have you ever heard Brett at any
21 other time refer to Ms. Carter as batshit?

22 A. Yes.

23 Q. Okay. And when was that?

24 A. I don't recall when it was.

25 Q. Okay. Was it on multiple other occasions?

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1 I, AUDREY STONE, have read the foregoing
2 deposition and hereby affix my signature that same
3 is true and correct, except as noted above.

4

5

6 _____
7 AUDREY STONE

8

9 THE STATE OF _____
10 COUNTY OF _____

11 9 Before me, _____, on this day
12 personally appeared AUDREY STONE, known to me (or
13 proved to me under oath or through _____) to
14 be the person whose name is subscribed to the
15 foregoing instrument and acknowledged to me that
16 they executed the same for the purposes and
17 consideration therein expressed.

18

19 Given under my hand and seal of office this _____
20 day of _____, 2020.

21

22

23

24

25

17 _____
18 NOTARY PUBLIC IN AND FOR THE
19 STATE OF _____

20

21 MY COMMISSION EXPIRES: _____

22

23

24

25

1 REPORTER'S CERTIFICATION

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE NORTHERN DISTRICT OF TEXAS
4 DALLAS DIVISION

5 CHARLENE CARTER)
6 VS.)
7 SOUTHWEST AIRLINES CO., AND)
8 TRANSPORT WORKERS UNION OF)
9 AMERICA, LOCAL 556)

10 CONFIDENTIAL
11 TWU LOCAL 556 30(b)(6)
12 DEPOSITION OF AUDREY STONE
13 NOVEMBER 30, 2020
14 (REPORTED REMOTELY)

15 I, CHARIS M. HENDRICK, Certified Shorthand
16 Reporter in and for the State of Texas, do hereby
17 certify to the following:
18 That the witness, AUDREY STONE, was by me
19 duly sworn and that the transcript of the oral
20 deposition is a true record of the testimony given
by the witness.
21 I further certify that pursuant to Federal
22 Rules of Civil Procedure, Rule 30(e)(1)(A) and (B)
23 as well as Rule 30(e)(2), that review of the
24 transcript and signature of the deponent:
25 xx was requested by the deponent and/or a

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1 party before completion of the deposition.

2 _____ was not requested by the deponent and/or
3 a party before the completion of the deposition.

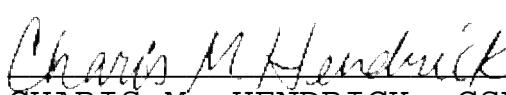
4 I further certify that I am neither
5 attorney nor counsel for, nor related to or
6 employed by any of the parties to the action in
7 which this deposition is taken and further that I
8 am not a relative or employee of any attorney of
9 record in this cause, nor am I financially or
10 otherwise interested in the outcome of the action.

11 The amount of time used by each party at
12 the deposition is as follows:

13 Mr. Gilliam - 2:43 hours/minutes

14

15 Subscribed and sworn to on this 8th day of
16 December, 2020.

17
18
19 
20 CHARIS M. HENDRICK, CSR # 3469
21 Certification Expires: 10-31-21
22 Bradford Court Reporting, LLC
23 7015 Mumford Street
24 Dallas, Texas 75252
25 Telephone 972-931-2799
Facsimile 972-931-1199
Firm Registration No. 38

